

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

| | |
|---|------------------------------------|
| CITY OF COLUMBUS, <i>et al.</i> , <i>Plaintiffs</i> , v. DONALD J. TRUMP, <i>et al.</i> , <i>Defendants</i> . | Civil Action No. 1:18-cv-02364-DKC |
|---|------------------------------------|

**DEFENDANTS' CONSENT MOTION TO EXPAND PAGE LIMIT FOR REPLY IN
SUPPORT OF DEFENDANTS' MOTION TO DISMISS**

Defendants Donald J. Trump, in his official capacity as President of the United States of America, Alex M. Azar, II, in his official capacity as Secretary of the United States Department of Health and Human Services, the United States Department of Health and Human Services, Seema Verma, in her official capacity as Administrator of the Centers for Medicare and Medicaid Services, and the Centers for Medicare and Medicaid Services (collectively, the “Defendants”), respectfully request, with Plaintiffs’ consent, an expansion of the page limit for Defendants’ Reply in support of Defendants’ Motion to Dismiss. Good cause exists to support this Motion, as set forth below:

In connection with Defendants’ Motion to Dismiss, Defendants requested, with Plaintiffs’ consent, and were granted an expansion of the applicable page limit for their memorandum in support to 62 pages. *See* Paperless Order of Mar. 7, 2019 [ECF 51]. Defendants filed a Motion to Dismiss Plaintiffs’ Amended Complaint, accompanied by a 62-page memorandum in support, on March 8, 2019. [ECF 52.] Plaintiffs then requested, with Defendants’ consent, and were granted an expansion of the applicable page limit for their opposition to 70 pages. *See* Paperless Order of May 28, 2019 [ECF 59]. Plaintiffs filed a 69-page opposition on May 31, 2019. [ECF 61.]

The current deadline for Defendants to file a reply in support of their Motion to Dismiss is August 21, 2019. In order to respond thoroughly to Plaintiffs' arguments, Defendants request an expansion of the page limit specified in the local rules. *See* LCvR 105.3 (setting default page limit for a reply at 20 pages). Undersigned counsel has conferred with counsel for Plaintiffs, who has indicated Plaintiffs consent to the expansion of the page limit requested by Defendants in this motion.

Accordingly, Defendants respectfully request that the Court grant an expansion of the page limit for Defendants' reply in support of their Motion to Dismiss to 40 pages. A proposed order is attached to this motion.

Dated: August 19, 2019

Respectfully submitted,

JOSEPH H. HUNT
Assistant Attorney General

JAMES M. BURNHAM
Deputy Assistant Attorney General

JEAN LIN
Special Counsel

/s/ Kathryn L. Wyer
KATHRYN L. WYER
Federal Programs Branch
U.S. Department of Justice, Civil Division
1100 L Street, N.W., Room 12014
Washington, DC 20005
Tel. (202) 616-8475 / Fax (202) 616-8470
kathryn.wyer@usdoj.gov
Attorneys for Defendants

CERTIFICATE OF SERVICE

The undersigned counsel certifies that on August 19, 2019, a true and accurate copy of the foregoing was electronically filed with the CM/ECF system, which will send a Notice of Electronic

Filing to all counsel of record in this matter.

/s/ Kathryn L. Wyer

KATHRYN L. WYER